



June 18, 2014

VIA ECF

Honorable Allyne R. Ross
U.S. District Court
Eastern District of New York
Brooklyn, New York 11201

**Re: Freire v. New York Motor Group LLC
13-cv-7291**

Dear Judge Ross:

This firm represents defendant Santander Consumer USA, Inc. in this matter. This matter is one of several matters that have been related by the Court including the Tuhin v. New York Motors Group, 13-cv-5643, and Gabrys v. New York Motors Group, 13-cv-7290. The plaintiffs in the related matters as well as the plaintiffs in this matter filed a letter seeking a pre-motion conference regarding its intent to file amend complaints in the various matters. On June 13, 2014, M&T Bank, a defendant in the Tuhin and Gabrys matters, filed a request with the Court for additional time to respond to the pre-motion conference request. In the letter, M&T Bank explained that it sought more time to respond to the request because, among other things, the proposed amended complaints contained several new claims and a host of new factual allegations. Counsel for M&T Bank also stated, with our consent and input, that Santander joined in the request for additional time to respond to the request. Because Santander is not a party in the Tuhin and Gabrys matter, we did not receive the Court's order of June 16, 2014 giving M&T Bank until June 20, 2014 to respond to the request. The Court's order did not refer to Santander's request. However, admittedly, the M&T Bank letter did not refer to Freire matter, and we did not follow the M&T Bank letter with one of our own.

In light of Santander's initial request seeking additional time as stated by M&T Bank and the Court's order granting M&T Bank additional time to respond and because the matters are related, Santander formally requests an extension of time to respond to the plaintiffs' request until June 20, 2014.

Thank you for your consideration.

Respectfully,

/s/ Robert J. Brener

Robert J. Brener

E-mail: Robert.Brener@leclairryan.com
Direct Phone: (973) 491-3347
Direct Fax: (973) 491-3432

885 Third Avenue, Sixteenth Floor
New York, New York 10022
Phone: 212.697.6555 | Fax: 212.986.3509

CALIFORNIA | COLORADO | CONNECTICUT | MARYLAND | MASSACHUSETTS | MICHIGAN | NEW JERSEY | NEW YORK | PENNSYLVANIA | VIRGINIA | WASHINGTON, D.C.